

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

Google LLC,
Plaintiff,

vs.

GVERIFIER TECHNOLOGIES
LLC, et al.

Defendant(s).

Case No.: 2:22-cv-4182-ALM-EPD

DEFENDANT'S

INITIAL DISCLOSURES
PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 26

TO Google LLC
AND HIS/HER/ITS COUNSEL OF RECORD:

DEFENDANTS, referred to below as the
(name)

"disclosing party," hereby submits the following disclosures in accordance with
Fed. R. Civ. P. 26 ("Rule 26")

Rule 26(a)(1)(A)(i) – The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support his or her claims or defenses, unless the use would be solely for impeachment:

Name of Individual Likely to have Discoverable Information	Contact Information (Address and Telephone Number)	Subject Matter of Discoverable Information
BHARAT PAREKH	4655 HILTON AVE Apt C COLUMBUS, OHIO 43228 614-446-7004	DOCUMENTS SHOWING INNOCENCE OF DEFENDANTS
KARSHOL PATEL	6663 MILLRIDGE CIR DUBLIN, OHIO 43228 614-772-9970	DOCUMENTS SHOWING INNOCENCE OF DEFENDANTS
GYANANNAND VYAS	6738 DARYLON DRIVE DUBLIN, OHIO 43017	DOCUMENTS SHOWING INNOCENCE OF DEFENDANTS
KAVITA VYAS	6738 DARYLON DRIVE DUBLIN, OHIO 43017	DOCUMENTS SHOWING INNOCENCE OF DEFENDANTS

Rule 26(a)(1)(A)(ii) – A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in his or her possession, custody, or control and may use to support his or her claims or defenses, unless the use would be solely for impeachment. (Please note that the disclosing party may either produce the documents, electronically stored information, and tangible things or fill in the table below.)

<u>Description by Category</u> of Document, Electronically Stored Information, or Tangible Thing	<u>Description by Location</u> of Document, Electronically Stored Information, or Tangible Thing
Documents showing Non use of anything relating to Google	4655 HILTON AVENUE APT C COLUMBUS, OHIO 43228
Documents showing Non use of anything relating to Google	6663 MILLRIDGE CREEK DUBLIN, OHIO 43228
Documents showing Non use of anything relating to Google	6738 DAIRYLAND DRIVE DUBLIN, OHIO 43017

Rule 26(a)(1)(A)(iii) – A computation of each category of damages claimed by the disclosing party, who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material (unless privileged or protected from disclosure) on which each computation is based, including materials bearing on the nature and extent of injuries suffered:

None

Rule 26(a)(1)(A)(iv) – For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:

None

Dated: May 27, 2023

By: /s/ Richard B. Parry

Richard B. Parry (0064777)
Trial Counsel
341 South Third Street, Suite 100
Columbus, Ohio 43215
Tel: (614) 288-3582
parrylaws@yahoo.com

CERTIFICATE OF SERVICE

I hereby certify that on May 27th, 2023, a true and correct copy of the foregoing DEFENDANT'S RULE 26(A)(1) INITIAL DISCLOSURES has, pursuant Fed. R. P. 5(b)(2)(E), has been served via email on counsel of record at the following addresses:

William G. Porter (17296)
52 East Gay Street
Columbus, Ohio 43214
wgporter@vorys.com

Karey E. Werner (95685)
200 Public Square, Suite 1400
Cleveland, Ohio 44114
kewerner@vorys.com

Whitty Somvichian
Reece Trevor
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
wsomvichian@cooley.com
rtrevor@cooley.com

Rebecca Givner-Forbes
1299 Pennsylvania Ave. NW, Suite 700
Washington, DC 20004-2400
rgf@cooley.com
jwilliams@cooley.com

Larry James (0021773)
Christopher Green (0096845)
CRABBE BROWN & JAMES, LLP
500 South Front Street 1200
Columbus, Ohio 43215
ljames@cbjlawyers.com
cgreen@cbjlawyers.com

By: /s/ Richard B. Parry

Richard B. Parry (0064777)